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[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KALMAN ISAACS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ELON MUSK, et al.,

Defendants.

) Case No. 3:18-cv-04865-EMC

) CLASS ACTION

) DECLARATION OF RANDI D. BANDMAN

) DATE: November 15, 2018

) TIME: 1:30 p.m.

) CTRM: 5, 17th Floor

) JUDGE: Hon. Edward M. Chen

1 I, RANDI D. BANDMAN, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California and this Court. I am Of Counsel to Robbins Geller Rudman & Dowd LLP, proposed lead
4 counsel for Dany David in the above-captioned action. I have personal knowledge of the matters
5 stated herein and, if called upon, I could and would competently testify thereto.

6 2. On November 14, 2018, I was watching the CNBC show *Fast Money Halftime*
7 *Report* and observed Andrew Left discussing Tesla and this case.

8 3. I had recorded the episode on my DVR.

9 4. I replayed the episode while recording the audio on my iPhone. I increased the sound
10 volume of my TV, which sound can be heard on the audio recording.

11 5. I emailed the recorded audio file from my iPhone to my colleague, Danielle Myers.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on
13 November 14, 2018, at Los Angeles, California.

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15 s/ Randi D. Bandman
16 RANDI D. BANDMAN
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 14, 2018 I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Randi D. Bandman

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)